



Privacy Policy

Permanent Care and Adoptive Families (PCA Families) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our privacy policy and it tells you how we collect and manage your personal information. We respect your rights to privacy under the *Privacy Act 1988 (Cth)(Act)* and we comply with the Act's requirements in respect of the collection, management and disclosure of your personal information.

What is your personal information?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information

What personal information do we collect and hold?

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number;
- age or birth date;
- profession, occupation or job title;
- orders related to a child in your care;
- information about a family provided by an agency and/or professional referrals and reports;
- court related and legal documents (attached to child history); and
- information you provide to us through surveys, emails or telephone calls from our organisation from time to time.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

PCA Families will adhere to the requirements of relevant privacy legislation including the *Privacy Act (Cth)* and *Health Records Act (Vic)* in respect to the collection, use, disclosure, secure storage and destruction of Information.

What health information do we collect?

PCA Families collects information which is held in a portal operated by a third party. This third party's privacy policy can be viewed at <https://www.ozchild.org.au/privacy-policy/>

PCA Families may collect the following types of health information:

- information about your physical and mental health;
- information about any disability you may have (at any time) ;
- your use of health services; or
- the future provision of health services.

How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- through your access and use of our website;
- during conversations between you and our representatives;
- when conducting surveys; and
- through technology associated with the collection of information on members or people using our services, including customer relationship management, phone systems and data portals.

We may also collect personal information from third parties including:

- third party companies such as services used to purchase products;
- allied health;
- courts;
- law enforcement agencies; and
- other government entities.

We won't disclose your personal information to third parties without your consent.

PCA Families may on occasion be contacted by agencies or other entities where their client has had contact with PCA Families.

What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, some or all the following may happen:

- we may not be able to provide the requested services to you.
- we may not be able to provide you with information about services that you may want.

For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide services to you and to send communications requested by you;
- to answer enquiries and provide information or advice about existing and new services;
- to undertake research using deidentified information;
- to advocate on your behalf or on behalf of permanent care and adoptive families;
- to assess the performance of the website and to improve the operation of the website;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

To whom may we disclose your information?

We may disclose your personal information to:

- our employees;
- related service providers for the purposes of operation of our website or our services, fulfilling requests by you;
- to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators; and
- any organisation for any authorised purpose with your express consent.

PCA Families will seek consent from you to contact a third party about your circumstances unless there is an immediate risk of harm identified for a child, young person or another person. Any client information used for PCA Families reports will be de-identified to protect the identity of children and families. We won't disclose your personal information to third parties without your consent.

Direct marketing materials

We may send you direct marketing communications and information about our services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003 (Cth)*.

You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We do not provide your personal information to other organisations for the purposes of direct marketing.

How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you).

There may be instances where we cannot grant you access to the personal information we hold. We can only provide you with personal information you are legally entitled to. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact the PCA Families Chief Executive Officer (CEO) using the contact information below and provide details of the incident. If determined appropriate, a full investigation will be carried out.

The CEO is responsible for investigating possible Data Breaches to determine if there has likely been an Eligible Data Breach that may require notification under the Australian mandatory Notifiable Data Breach Scheme. The CEO is also responsible for assessing any incident to identify what is required to avoid future occurrences, for example:

- Changes to existing, or the development of new, policies and procedures
- Systems and/or organisational infrastructure upgrades or procurement
- Professional development
- Performance management

The CEO is responsible for reporting Data Breaches to the PCA Families Board, including on:

- Progress of investigations;
- Preliminary assessment of the underlying cause of the Data Breach and likely impact on affected individuals;
- Recommendations about whether PCA Families is required to make a formal or voluntary notification in accordance with the Notifiable Data Breach Scheme; and
- Implementation of remedial plans.

The Board is responsible for deciding whether a notification, whether voluntary or mandatory, to affected individuals and the Australian Information Commissioner is required, with consideration of the requirements of the Notifiable Data Breach Scheme and other best practice considerations. After we have completed our enquiries, you will be advised of the outcome.

Do we disclose your personal information to anyone outside Australia?

To the best of our knowledge, we do not disclose personal information to overseas recipients and information is held in Australia.

Security

We take reasonable steps to ensure your personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure. We may hold your information in either electronic or hard copy form. We work to ensure that our data is up to date, accurate and complete.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Destruction and deidentification

Personal information is destroyed or deidentified when it is no longer needed for the purpose it is being held for.

We will hold your personal information for a period of 7 years, or if we hold information on a minor, it will be held until they turn 25 years as per the requirements in the *Health Records Act*.

Contacting us

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact our Privacy Officer at:
Privacy Officer
PCA Families
Post: PO Box 201, Fitzroy, Victoria, 3065
Email: ceo@pcafamilies.org.au

Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. Please review it regularly.

This privacy policy was last updated on 25 August 2021.